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NAME OF COMMITTEE (In Full)
Chubb Group Holdings Inc. Legacy Political Action Committee

FEC IDENTIFICATION NUMBER
C00229203

Mailing Address 15 Mountain View Road

City	State	ZIP Code
Warren	NJ	07059

FEC Form 99, to accompany The Chubb Group Holdings Inc. Legacy Political Action Committee Termination Report: This FEC Form 99 is submitted in conjunction with the November 8, 2016, Termination Report (FEC Form 3X TER Report) for Chubb Group Holdings Inc. Legacy Political Action Committee (Legacy ChubbPAC). We ask the Commissions consideration of the following request to correct a calculation issue regarding the balance of funds in Legacy ChubbPAC, which we outline as follows: Legacy ChubbPAC seeks termination due to the acquisition of its connected company, The Chubb Corporation, in January, 2016. In anticipation of the request for termination, Legacy ChubbPAC made its last disbursement on August 18, 2016, a \$256. contribution refund to an individual. Legacy ChubbPAC accepted its last contribution on September 1, 2016. On October 12, 2016, Legacy ChubbPAC transferred all of its remaining funds \$110,696.37 to the successor company PAC, Chubb Group Holdings Inc. Political Action Committee (New ChubbPAC). The first FEC report filed after that fund transfer was our recent 12G filing, which we prepared through VOCUS, the PAC database vendor that we have used for a number of years to manage our PAC finances and FEC reports. That 12G report, however, indicated a discrepancy of \$38.48 between the amount shown in Line 8 as Cash on Hand at the Close of the Reporting Period (<-\$38.48>) and the amount of cash on hand shown in the VOCUS database (\$0) (as well as in our bank records, also \$0). Contrary to our bank records and the information in VOCUS, the FEC report generated out of VOCUS indicates that the PACs total cash on hand, prior to disbursements, at the end of the 12G reporting period was \$110,657.89, or \$38.48 less than the amount in our records in VOCUS and in our bank records. We have researched this discrepancy in several ways both through the VOCUS database and by comparing our bank statements with our FEC reports for the past three years. We reconcile our bank statements with VOCUS each month and have never had a discrepancy of any amount between those two records. To research the possible origins and cause of the \$38.48 discrepancy, we first queried the VOCUS database for any receipt in the amount of \$38.48. That query produced no record of a receipt in that amount. We then compared our bank statements to our FEC reports for each month, going back to September 2013. That research revealed that the \$38.48 discrepancy between our FEC reports and our records has existed undetected, for more than three years, with our bank and VOCUS records reflecting \$38.48 more in cash on hand than the cash on hand amount that was ceded into our FEC reports through VOCUS. We do not have an explanation for this discrepancy. We know that its origins were prior to Sept. 2013 and that due to the peculiar way in which it occurred (as a discrepancy between the FEC report and the information in the VOCUS database), it seems most likely to be an error that occurred when information was downloaded from the VOCUS database into the FEC reports we generated through VOCUS. We are confident that the discrepancy was not between our bank records and VOCUS, as those records are reconciled monthly. Because the VOCUS database reconciled with our bank records each and every month, we had no reason to believe that there could be any variance in the data drawn from VOCUS that populated our FEC reports. Indeed, while there is a discrepancy, we believe that the error occurred more than three years ago and possibly occurred in the download of information from VOCUS into the FEC form. Further, we believe that the cash on hand amount reflected in our bank records and in VOCUS both showing \$0 is the accurate sum. In our recent 12G filing, we sought permission to amend the record to reflect the accurate amount of \$110,696.37 as the Cash on Hand at the Beginning of the 12G Reporting Period (line 6(a)), allowing

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us to show the accurate PAC balance of \$0.
Similarly, with this Termination Report, we request that the Commission grant this request to terminate Legacy ChubbPAC, in light of the de minimus amount at issue and our inability to determine where or when within the report generation process the error occurred. We thank the Commission for its consideration of this request.